

EXHIBIT 7

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUSAN COONEY,

Plaintiff,

COPY

vs.

Docket No. 0411572 JLT

SAYBROOK GRADUATE SCHOOL and
RESEARCH CENTER, and MAUREEN
O'HARA, Individually,

Defendants.

Deposition of
ALAN G. VAUGHAN, Ph.D.

MARCH 16, 2006

NOTICING ATTORNEY, PAUL W. MORENBERG, ESQ.

REPORTED BY: JEANINE FARRELL, CSR NO. 7774

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1 A. Associate Professor, Adjunct Professor of
2 Psychology.

3 Q. Do you teach any courses at the California
4 Institute of Integral Studies regarding licensing
5 standards for psychologists?

6 A. I do not.

7 Q. And do you provide any guidance to graduate
8 students in that program regarding licensing
9 standards for psychologists?

10 A. I do not.

11 Q. And do you provide any assistance or
12 guidance to the administration or to fellow faculty
13 at the California Institute of Integral Studies
14 regarding licensing standards for psychologists?

15 A. I do not.

16 Q. Tell me about when you joined Saybrook and
17 what position you assumed there?

18 A. I joined Saybrook I think in 2003 and I
19 joined as an executive faculty member full-time.

20 Q. Could you be more specific about the month
21 when you joined Saybrook?

22 A. I think it's February, but that's all I can
23 recall.

24 Q. And do you recall who recruited you to join
25 Saybrook?

1 Q. And tell me everything you can recall about
2 that discussion?

3 A. It was over lunch and we were talking about
4 -- I came in sort of mid-year and so it was over
5 lunch and we were talking about some of the things
6 that they might need done given my background. And I
7 was actually learning the technology. And they asked
8 me if I would help them develop a web page that would
9 be -- would provide additional education to students
10 on the regulatory scheme of the field of psychology
11 and to facilitate interaction between the students
12 and their local psychology boards and then to consult
13 with students. If questions specific to the statutes
14 -- state statutes of what a psychology rules arose
15 that needed some clarification. So it was
16 specifically in a consultive capacity to the
17 students.

18 Q. When you refer to your background, is it
19 fair to say you're referring to your legal education
20 as well as your psychology background?

21 A. I'm not -- I don't understand the question.

22 Q. Maybe it was unclear. During your testimony
23 I believe you made reference to your background --
24 strike that.

25 MR. MORENBERG: Could you read back the last

1 A. I started doing the research maybe -- if I
2 started -- maybe April or May would have been a time
3 that I started.

4 Q. Is that April or May of 2003?

5 A. Of 2003.

6 Q. And did Dr. Bohart or Dr. Clark -- strike
7 that.

8 Did Dr. Bohart indicate to you why he wanted
9 you do develop the legal information -- strike that.

10 Did Dr. Bohart indicate to you why he wanted
11 you to develop the licensing information bulletin at
12 that time?

13 A. Yes.

14 Q. What did he tell you?

15 A. Well, both of them together -- I met with
16 both of them together -- and I'm trying to recall the
17 conversation. I think that they wanted to take
18 additional steps to educate students on the
19 regulatory scheme and to facilitate the interaction
20 between the students and their local psychology
21 boards. And so to have that information available to
22 them and to have somebody available to consult with
23 them about the reading of the statutes and the board
24 of psychology rules I think was important.

25 Q. Do you have any specific memories of

1 Q. Did you receive any documents from Bill
2 Bruff that were useful in your project?

3 A. Not that I can recall.

4 Q. And I have asked you about a series of
5 individual faculty members and administrators, can
6 you think of anyone else at Saybrook who ever
7 provided information to you in the form of documents
8 that was relevant to your project?

9 MR. VARTAIN: Objection.

10 THE WITNESS: Not that I can recall.

11 MR. MORENBERG: Q. And can you tell me when
12 you completed your bulletin on licensing standards?

13 A. I think it was probably by July -- by the
14 end of July.

15 Q. An that's July of 2003?

16 A. 2003.

17 Q. And do you know what became of that
18 document?

19 A. Yes.

20 Q. What was it used for?

21 A. It was used to put on -- to put on a web
22 page.

23 Q. Was that Saybrook's web page?

24 A. Yes.

25 Q. And is that --